

February 2, 2006

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Certification of CPNI Filing

Joshua W. Wood

EB-06-TC-060 & EB Docket No. 06-36

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64 2009(e) of the Commission's Rules, is our compliance certificate and accompanying statement for the year ended December 31, 2005.

Very truly yours,

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## **CERTIFICATION**

I, Barbara W. Wood, hereby certify this 2 day of February, 2006 that I am an officer of Piedmont Communication Services, Inc. and that I have personal knowledge that Piedmont Communication Services, Inc. has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2009.

Barbara W Wood

Joshua W Mood

President

## STATEMENT

Piedmont Communications Services, Inc. ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI
  rules with respect to outbound marketing situations and maintains records of carrier
  compliance for a minimum period of one year. Specifically, Carrier's sales personnel
  obtain supervisory approval of any proposed outbound marketing request for customer
  approval regarding its CPNI.

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